

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

STEVEN DONZIGER,

Defendant.

No. 1:19-CR-00561 (LAP)

Declaration of Zoe Littlepage

Zoe Littlepage, does hereby declare as follows:

1. I, Zoe Littlepage, am an attorney for Steven Donziger in this matter.
2. Beginning in late July, the Barbados government started allowing a limited number of commercial flights to return to the island. These are mainly repatriation flights for returning Barbadian citizens who were caught abroad when the island's airport closed for many months due to the pandemic. Currently there is one commercial flight per week from the United States of America (Jet Blue).
3. As there is no community spread of coronavirus in Barbados, the government is vigilant about protecting the island from the importation of the disease. All passengers from the United States must submit to mandatory nasal and throat swab testing by the government upon arrival (unless they had this precise test done within 72 hours of touch-down at an accredited PCR-testing facility and can show a certified copy of a negative result). Every person must then enter 7-14 days of government supervised quarantine and have a second negative nasal swab test before they can be released from quarantine. If a passenger tests positive on either of these tests, they are immediately taken into government custody and kept in isolation at a coronavirus-

dedicated medical facility until the Ministry of Health approves their release. All passengers who sat within 4 rows of a positive passenger are also taken into extended government custody for isolation, testing and monitoring.

4. Because of these protocols, Barbados now has actual statistics on the probability of Covid-positive people being aboard any random commercial flight. The attached public information statements are from the Barbados Government Information Services and document some of this data. On every Jet Blue flight into the island to date, the government's diligent testing of passengers has uncovered positive Covid-19 cases. All of those people reported no symptoms of Covid-19 when they boarded the airplane. Fellow passengers who sat close to or within a few rows of the Covid-19 positive patients have also become infected. Indeed, passengers who were negative on arrival are testing positive a week later (at the time of the second test) because they were exposed on the flight.¹

5. Barbados' data confirms that there are positive Covid-19 passengers who can and do infect fellow passengers on almost every commercial flight.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed this 19th day of August 2020 in St. Michael, Barbados.



Zoe Littlepage

¹ <https://barbadostoday.bb/2020/07/26/covid-19-update-two-new-cases-today-2/> (A week after arriving in Barbados on an Air Canada flight, a female visitor became the fourth person from that flight to test positive).



COVID-19 Update: Four New Cases, Four Recoveries

BY JOY SPRINGER | AUG 9, 2020 |

Four people have gone into isolation after testing positive for COVID-19 yesterday, and four will leave the facility today after recovering. This development takes the number of confirmed cases to 142, while the numbers in isolation remain at 23.

The four new cases all arrived in the island yesterday – two Barbadian men on a Jet Blue flight and two in transit passengers on a Virgin Atlantic flight.

The number of persons who have recovered from the viral illness has increased to 112, while deaths remain at seven.

The Best-dos Santos Public Health Laboratory conducted 231 tests yesterday, bringing the total number of tests performed by the laboratory to 13,016.

<https://gisbarbados.gov.bb/blog/covid-19-update-four-new-cases-four-recoveries/>



COVID-19 Update: One-Year-Old Tests Positive

BY JOY SPRINGER | AUG 12, 2020 |

Barbados' youngest COVID-19 patient to date is a one-year-old boy, who was diagnosed with the viral illness yesterday.

The boy arrived in the island on August 1 on a Jet Blue flight, accompanied by his mother. The mother tested positive on arrival and both she and the child have been in isolation at Harrison Point, St. Lucy, since then. Both mother and son are asymptomatic.

Meanwhile, three people will be discharged from the isolation facility today after recovering from COVID-19.

This brings the number of recoveries since the outbreak began in March to 115. There are now 144 confirmed cases and 22 people are in isolation. Seven deaths have been recorded.

The Best-dos Santos Public Health Laboratory completed 176 tests yesterday, bringing the total number of tests performed to 13,489.

<https://gisbarbados.gov.bb/blog/covid-19-update-one-year-old-tests-positive/>



COVID-19 Update: Four New Cases, One Recovery

BY BGIS | AUG 14, 2020 |

Four people will go into isolation today after being diagnosed with COVID-19, and one person will be discharged from the facility at Harrison Point, St. Lucy.

A 32-year-old Barbadian female tested positive on arrival on a British Airways flight yesterday.

The other three were all re-tests – a 75-year-old Barbadian man, who arrived on Jet Blue on August 8; a 25-year-old Barbadian man, who arrived on Air Canada on August 9, but whose travel originated in the United States; and a Ghanaian nurse, who arrived on July 30, and is positive after a third test.

There are now 148 cases of COVID-19 recorded in Barbados, and 119 people have recovered. Twenty-two people are in isolation.

The Best-dos Santos Public Health Laboratory completed 380 tests yesterday, bringing the total number of tests performed since February to 14,037.

<https://gisbarbados.gov.bb/blog/covid-19-update-four-new-cases-one-recovery/>



COVID-19 Update: Two New Cases, Two Recoveries

BY JOY SPRINGER | AUG 15, 2020 |

Two more people tested positive for COVID-19 yesterday after being tested a second time.

The two, a 41-year-old female visitor and a 55-year-old Barbadian woman, arrived on a Virgin Atlantic flight on August 8. They are both asymptomatic.

Meanwhile, two people have recovered from the viral illness and will be discharged from the Harrison Point, St. Lucy isolation facility, today.

As a result, while the tally of recorded cases has increased to 150 and recoveries to 121, the number of people in isolation remains 22.

The Best-dos Santos Public Health Laboratory completed 180 tests yesterday, and a total of 14,217 tests since February 11.

<https://gisbarbados.gov.bb/blog/covid-19-update-two-new-cases-two-recoveries/>



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COVID-19 Update: One New Case, One Recovery

BY JOY SPRINGER | AUG 16, 2020 |

There was one new case of COVID-19 recorded among the 204 tests carried out by the Best-dos Santos Public Health Laboratory yesterday.

The 57-year-old Barbadian female arrived at the Grantley Adams International Airport on a Jet Blue flight yesterday afternoon and was immediately transferred to the isolation facility at Harrison Point, St. Lucy, after testing positive for the viral illness.

The results also yielded a second consecutive negative test for one patient at the isolation facility, and that person will be discharged today.

Barbados' tally of confirmed cases is 151, and recoveries have increased to 122. The number of people in isolation remains at 22.

The public health laboratory has completed a total of 14,423 tests. Included in that number are two tests conducted on Friday, which were both negative. These results were returned late last night after the publication of yesterday's dashboard.

<https://gisbarbados.gov.bb/blog/covid-19-update-one-new-case-one-recovery/>